



AMERICAN ACADEMY
EDUCATE | INNOVATE | EXPLORE

10/15/2017

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Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of American Academy, located in Castle Pines, Colorado, that provides approximately 5 performances per year to 5,000 audience members and education programs to 3000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

At American Academy we use an average of 20 wireless systems per performance for the purpose of amplifying our developing students as they learn the art of story-telling via their stage exploits. Of those, we rent about 15 units and own 8 of our own which cost us about \$4,000.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:



- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has sought Public Comment on this very important issue. Educational institutions and professional performing arts organizations should have access to reliably available spectrum with interference protection in an effort to honor the work of our students. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band, an in particular educational organizations whose hands are often tied in terms of replacement financing. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference for the sake of our student's development.

In addition to the educational element, school theatre programs provide demonstrable service to their individual communities, serving as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21st century skills, such as creativity and collaboration. . They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

Mark Middlebrooks

Director, Specials Department

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